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July 15, 2011

Hon. Brian M. Cogan
US District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Church & Dwight Co., Inc. v. Kaloti Enterprises of Michigan, LLC, et al.
US District Court Eastern District of New York Docket No: 07-cv-612

Dear Hon. Cogan:

We are the new attorneys for the defendants, David Tang a/k/a Xiong Ping Tang and T & L Trading Company, in connection with the above referenced case. We are writing this letter to request a pre-motion conference pursuant to your part rule.

On or about January 21, 2011, the plaintiffs obtained a default judgment against our client in the amount of \$400,000. We are preparing an order to show cause to vacate default judgment pursuant to FRCP 60 (b).

Currently, the plaintiffs are trying to enforce judgment and have already served subpoena with restraining notice upon banks and froze bank accounts of our client. Therefore, it is really necessary for us to file an order to show cause with request for stay of enforcement of judgment immediately unless the plaintiffs consent to stay enforcement of judgment until our motion is decided.

Our client has excusable neglect based on law office failure. Our client retained a different attorney, Jonathan Marks, PC, before; however, the previous attorneys never answered the complaint; and thus, our client defaulted.

Our client was also cooperating with the plaintiffs' investigation into the alleged trademark infringement, and also trying to settle the instant matter. Therefore, our client had no idea that our client was running the risk of getting default judgment.

In addition, our client also has meritorious defense. Our client has never knowingly, intentionally and willfully sold and distributed counterfeit condoms. The lack of intent is relevant in the calculation of damages since the court may award full damages and even treble damages and attorneys' fee in the case of willful or bad faith trademark infringement.

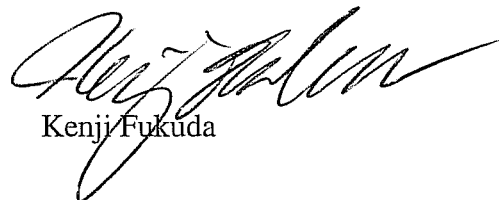
The court's decision shows that the court just awarded statutory damages to the plaintiffs pursuant to 15 USCA 1117 instead of holding a damage hearing to determine the actual damages.

So it was possible that the actual damages were less than the statutory damages, \$400,000 against our client. Moreover, some case laws state that the plaintiffs may not be entitled to any damages in case of innocent infringer.

Therefore, we would like to request for a pre-motion conference to discuss our proposed order to show cause to vacate default judgment with request for stay of enforcement of judgment.

Should you have any questions, please do not hesitate to contact the undersigned. Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Kenji Fukuda', written in a cursive style.

Kenji Fukuda

CERTIFICATION OF SERVICE

The undersigned hereby certifies that all counsels of record were served with a copy of this document through the Court's CM/ECF System, on this 15th day of July, 2011.

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